

Whitt Law Firm, LLC

ATTORNEYS AND COUNSELORS AT LAW

ADMITTED TO THE UNITED STATES
SUPREME COURT BAR (1996)

“A VETERAN OWNED LAW FIRM”

OF COUNSEL:

RICHARD L. WHITT

JEFFERSON D. GRIFFITH, III

401 WESTERN LANE, SUITE E,
IRMO, SOUTH CAROLINA 29063
MAILING ADDRESS: POST OFFICE BOX 362
IRMO, SOUTH CAROLINA 29063
TELEPHONE: (803) 995-7719

August 4, 2021

VIA, ELECTRONIC FILINGThe Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina

- Re: • South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC;
 • **Docket No. 2019-224-E (Duke Energy Carolinas, LLC)**
 • **Docket No. 2019-225-E (Duke Energy Progress, LLC)**

Ms. Boyd:

On behalf of the Carolinas Clean Energy Business Association (“CCEBA”), Intervenor in the above Dockets, we write to inform you that CCEBA has received and considered the Petition for Reconsideration of the July 21, 2021, Directive Order, filed by Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together “Duke” or “the Companies”) on July 30, 2021. In the Petition for Reconsideration, Duke requested that the Public Service Commission of South Carolina reconsider its Directive Order issued on July 21, 2021 (the “Directive”), which required the Companies to file annual updates to their Integrated Resource Plans, now pending before this Commission, on or before December 6, 2021. Duke requested that the December 6, 2021, deadline be rescinded and that the Commission “hold in abeyance the Companies’ obligation to file an update to their IRPs until no earlier than sixty (60) days following the issuance of an Order accepting their modified IRPs.”

CCEBA supports the relief sought in Duke’s Petition and agrees that it is in the best interest of the Companies, the Intervenor, and the ratepayers of South Carolina to allow the Companies to file their modified IRPs and to allow the process of consideration and approval of those modifications to complete before requiring updated IRPs to be filed. In essence, the update should be built off of an approved IRP.

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Under the current Directive, two parallel proceedings could take place with neither establishing a definitively “approved” IRP under the Energy Freedom Act. Such a circumstance would cost all parties and the State of South Carolina time and money with no real benefit. Holding the obligation to update the IRPs in abeyance until a time 60 days after approval of the modified IRP would avoid that issue, would allow conservation of party and Commission resources, and would provide all parties with an approved IRP against which to prepare and evaluate any updates.

By copy of this letter, we are serving all parties to these Dockets with notice of CCEBA’s position.

Respectfully Submitted,

/s/Richard L. Whitt,
Richard Whitt,

/s/John D. Burns
John D. Burns
General Counsel
Carolinas Clean Energy Business Association,
Admitted *Pro Hac Vice*,

*Both as Counsel for Carolinas Clean Energy
Business Association.*

cc: All parties of record in Dockets 2019-224-E and 2019-225-E, *via electronic mail*